

FILED

Dec 10 2021

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

STEPHANIE M. HINDS (CABN 154284)
Acting United States Attorney

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

| | | |
|---------------------------|---|--|
| UNITED STATES OF AMERICA, |) | CASE NO. CR21-476 JD |
| Plaintiff, |) | |
| v. |) | <u>VIOLATIONS:</u> |
| AARON HAYNES MORRIS, |) | 18 U.S.C. § 1343 – Wire Fraud; |
| Defendant. |) | 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – |
| |) | Forfeiture Allegation |
| |) | SAN FRANCISCO VENUE |
| |) | |
| |) | |

I N F O R M A T I O N

The United States Attorney charges:

Introductory Allegations

At all times relevant to this Information:

1. Defendant AARON HAYNES MORRIS resided in or around Los Gatos, California.
2. Company R was a Japanese electronic commerce and online retailing company based in Tokyo, Japan. Company R has offices in San Mateo, California, and MORRIS was employed there from approximately June 2019 to October 2019.
3. Company CC was a human resources consulting firm with offices on Post Street in San Francisco, California. MORRIS was employed there from approximately September 2019 to October 2019.

INFORMATION

misrepresented his employment history, including by claiming that he had worked at McKinsey & Company and Salesforce;

- b. Using his brother's Social Security number and date of birth for purposes of prospective employers' background checks, in order to conceal the fact that MORRIS had been convicted of fraud in Florida in 2015 for embezzling from his then-employer;
- c. Creating an email alias, clf-2116@columbia-gsb.org, and posing as a Columbia Business School employee for the purposes of verifying his supposed enrollment at the school.

Use of the Wires

10. On or about June 4, 2019, in the Northern District of California and elsewhere, for purpose of executing the aforementioned scheme and artifice to defraud, the defendant,

AARON HAYNES MORRIS,

did knowingly transmit and cause to be transmitted in interstate and foreign commerce, by means of a wire communication, certain writings, signs, signals, pictures, and sounds, specifically, an email to Victig from "CLAUDIA FONG," purported Senior Associate Director of Operations at Columbia Business School, email address clf-2116@columbia-gsb.org, confirming MORRIS had attended Columbia.

All in violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATION: (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

11. The allegations contained in this Information are re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

12. Upon conviction for the offense set forth in this Information, the defendant,

AARON HAYNES MORRIS,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), all property, real or personal, constituting, or derived

1 from proceeds the defendant obtained directly and indirectly, as the result of those violations, including
2 but not limited to a forfeiture of money judgment.

3 If any of the property described above, as a result of any act or omission of the defendant:

- 4 a. cannot be located upon exercise of due diligence;
- 5 b. has been transferred or sold to, or deposited with, a third party;
- 6 c. has been placed beyond the jurisdiction of the court;
- 7 d. has been substantially diminished in value; or
- 8 e. has been commingled with other property which cannot be divided without
9 difficulty,

10 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,
11 United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

12 All pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code,
13 Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

14
15 DATED: December 10, 2021

STEPHANIE M. HINDS
Acting United States Attorney

17 /s/ Leif Dautch
18 LEIF DAUTCH
Assistant United States Attorney